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*Of Counsel*  
Charles H. Hardage, Esq.

Thursday, January 2, 2025

**Via Electronic Filing**

Hon. Andrew E. Krause, U.S.M.J.  
The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

Re: Request to Appear Remotely for Conference  
Case No.: 7:23-cv-04533  
*Project Veritas, et al. v. James O'Keefe, et al.*

Dear Judge Krause:

In its Order [Doc. 117] on the proposed order to show cause and motion to withdraw filed by Plaintiffs' counsel [Docs. 110-115], the Court has scheduled an in-person conference for Wednesday, January 8, 2025 at 10:00 a.m. Undersigned counsel represents Defendants James O'Keefe and O'Keefe Media Group (together "Defendants") in the above-referenced litigation and moves the Court to permit Defendants' counsel to appear remotely for the in-person conference.

Defendants' counsel's office is located in Gainesville, Florida, and Defendants ask that their counsel be permitted to appear remotely to avoid the cost and burden associated with travel from Florida to New York for a relatively brief conference. While the matter to be addressed will affect the pace of this litigation, Defendants are neither movant nor respondent and will not present any evidence or testimony.

In lieu of in-person attendance, Defendants request to be permitted to appear via the Court's preferred video conferencing software at the hearing scheduled for Wednesday, January 8, 2025, at 10:00 a.m.

Defendants' counsel has conferred with Plaintiffs' counsel on this logistical concern. Plaintiffs' counsel does not oppose Defendants' request to appear remotely for the scheduled conference.

Thank you for your consideration and attention to this matter.

Regards,

A handwritten signature in black ink, appearing to read "Nicholas P. Whitney". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Nicholas P. Whitney

NPW/adm

cc: counsel of record via CM/ECF  
R.C. Maxwell (rc@rcmaxwell.com)

